



THE CITY OF NEW YORK
LAW DEPARTMENT

Hon. Sylvia Hinds-Radix
Corporation Counsel

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March 4, 2022

Via ECF

Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Carol Hasday v. City of N.Y. et al., 19-CV-10239 (LAP)

Your Honor:

I am the Assistant Corporation Counsel in the Office of Georgia M. Pestana, Corporation Counsel of the City of New York, assigned to represent Defendants City of New York and Sherry S. Chan in the above-referenced matter. The parties write jointly to respectfully request an extension of time to submit the parties' joint discovery dispute letter, from March 8, 2022, to March 15, 2022. This is the fifth such request.

Since the time of the last extension, the parties have been extensively discussing reaching a settlement. The parties believe that another week will allow the parties to make final determinations about whether this matter can be resolved without further litigation. If a settlement cannot be reached by March 8, 2022, the parties anticipate going forward with the depositions that are currently scheduled for the week of March 21st, 2022.

Accordingly, the parties respectfully request that the Court extend the deadline for the parties to submit a joint discovery dispute letter until March 15, 2022.

We thank the Court for its attention to this matter.

Respectfully submitted,
/s/
Maria Fernanda DeCastro
Assistant Corporation Counsel

CC: By ECF

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SO ORDERED .

Dated: March 4, 2022
New York, New York

LORETTA A. PRESKA

Senior United States District Judge